

DRAFT – INTERNAL USE ONLY

March 20, 2015

**Superfund/Remedial Program
Communication Strategy for Site Priorities and Milestones
(Mar – Sep 2015)
Anaconda/Yerington Mine Site**

Background

After EPA considered then deferred a decision to list the Anaconda/Yerington Mine Site (“Site”) on the National Priorities List (NPL) in 2001, the investigation and evaluation of hazardous substance releases at the site proceeded under the joint direction of the NDEP, EPA and BLM. By 2004, that joint process was determined to not be an effective way of managing the magnitude and complexity of issues associated with the Site. In December 2004, NDEP requested and EPA took the lead agency role managing the Site as a non-NPL CERCLA site.

Under the direction and approval of EPA, and with the involvement of a larger stakeholder group over the past 10 years, Atlantic Richfield (AR) has completed a great deal of data collection and data analysis for areas on the 3,400 acre mine property and an off-site area extending approximately 4 miles to the North of the property boundary. This work has included the collection of greater than 1,000 soil/rock/waste samples, greater than 10,000 groundwater samples, and installation of 354 currently active groundwater monitoring wells. The main areas of focus have been site-wide groundwater characterization and the former Anaconda Process Areas and Evaporation Ponds. On a parallel path, and with assistance from AR and Singatse Peak Services (SPS), EPA and NDEP have completed a number of stabilization actions and remedial alternative evaluations for the areas of the site (OU-8) previously operated by Arimetco.

Key Messages

1. All of this work across the site has laid a solid foundation for moving into completion of investigation and final remedy selection for priority OUs over the next 3 to 4 years.
2. We have identified priority OUs for decision making, based on their increased potential for continuing releases or migration of hazardous substances and human health risk exposure relative to other site areas.
3. The project team has developed a list of key project milestones for 2015. Making substantial progress on these milestones is our top priority and will provide better overall certainty and predictability for the project.
4. For Arimetco areas of the site, we are ready to move into final remedy selection, but need to identify a funding source for completing the work. NDEP and EPA are engaging with AR?

and SPS? to find out if there are alternatives to funding this area of the site.

Project Description

In consultation with NDEP, EPA has identified priority OUs based on their increased potential for human health risk exposure. EPA has targeted the following key milestones in 2015 for each of these areas:

| Area | Characterization Narrative | 2015 Milestones |
|----------------------------------|--|---|
| OU 1 Site-wide Groundwater | While work is scheduled to limit exposure to potentially contaminated groundwater by providing an alternate and permanent source of drinking water, CERCLA and state water pollution control law require protection and eventual restoration of groundwater resources in the Mason Valley. | Complete Remedial Investigation (RI) Report by 12/31/2015 Complete Human Health Risk Assessment (HHRA) Work Plan by 12/31/2015 |
| OU 3 Anaconda Process Areas | Extensive characterization completed indicates that this site is ready to move directly into completion of the data evaluation and remedy selection. Completing the process for this area will lay some of the groundwork for next steps at other areas of the site. | Complete RI Report by 12/31/2015 |
| OU 10 Anaconda Evaporation Ponds | OU 10 is potentially a significant continuing source of uranium and sulfate gw contamination. | Complete Remedial investigations by 11/1/2015 |
| OU 7 Tailings Drain | Because the drain is not within the former mine | Complete RI and RMI Work Plans by 12/1/2015 |

| | | |
|--|--|--|
| | property and access to the drain is not limited, the potential long term human health risk associated with past mine site discharges to the drain needs to be assessed. Additionally, the potential contribution of the drain to other exposure pathways needs to be assessed and evaluated. | |
| | capacity is decreasing. To prevent needing additional ponds when capacity issues becomes more imminent, funding sources must be identified and secured, so that planning phased closure activities may begin soon. | 2015 so that phased remedy construction can commence no later than 2019. |

Communication Strategy

We will employ a phased approach in messaging this information. This communication strategy only addresses Phase 1, up to September 2015 when EPA and NDEP will meet and consider and approach for Phase 2. During Phase 1, these messages and Project Description will be briefly described in PowerPoint presentations. Additional one-on-one and individual group meetings will include answering follow up questions and discussion, verbally.

EPA and NDEP will communicate with the following stakeholders in a phased approach with small group meetings:

| Stakeholder | Date | Key Issues |
|-------------|------|------------|
|-------------|------|------------|

| | | |
|--|-----------------------|---|
| Atlantic Richfield | 3/27/15 | <p>Criteria and timing for AR to contribute to OU-8</p> <p>What are they ok with communicating publicly</p> <p>Agreement/understanding on site-wide priorities and schedule</p> |
| Singatse Peak/Freeport | February – March 2015 | <p>Criteria and timing for SPS to contribute to OU-8</p> <p>What are they ok w/ communicating publicly</p> <p>Agreement/understanding on site-wide priorities and schedule</p> |
| Freeport McMoran | March – April 2015 | <p>Criteria and timing for Freeport to contribute to OU-8</p> <p>What are they ok w/ communicating publicly</p> <p>Agreement/understanding on site-wide priorities and schedule</p> |
| City of Yerington/Lyon County (City Manager, County Manager, | April 2015 | <p>Site Priorities</p> <p>NPL versus non-NPL milestones and decision making</p> |
| Yerington Paiute Tribe (EPA only) | March 2015 | <p>Focus and structure for Tribal representative involvement in interim technical work products</p> |
| State Legislators Assembly: Robin Titus Senate: James Settlemyer | April 2015 | <p>Site Priorities</p> <p>NPL versus non-NPL milestones and decision making</p> |

| | | |
|--|---------------|--|
| Federal Elected Officials Congressman Mark Amodei Senator Harry Reid | May/June 2015 | Site Priorities NPL versus non-NPL milestones and decision making |
|--|---------------|--|

Potential Questions from Stakeholders/Community

1. What happens if you can't find any private funding sources?
2. What private funding sources are you looking at?
3. How will the community's voice be heard in this process?
4. What will the economic impacts to the community be?
5. What's the rush?

Project Leads

EPA Program Contacts:

RPM Dave Seter, 415-972-3250

RPM Dante Rodriguez, 415-972-3166

Community Involvement Coordinator Sarah Cafasso, 415-972-3076

Site Assessment Manager (NPL Listing) Eugenia Chow, 415-972-3160

EPA Management Contacts:

Harry Ball, 415-972-3047

Angeles Herrera, 415-972-3144

Enrique Manzanilla, 415-972-3843

EPA Program Communications Liaison:

Rusty Harris-Bishop, 415-972-3140

NDEP Program Contact:

Jeryl Gardner, 775-687-9484

NDEP Management Contacts:

Jeff Collins, 775-687-9381

Greg Lovato, 775-687-9373

Colleen Cripps, 775-687-9301

NDEP Public Information Officer:

JoAnn Kittrell, 775-684-2712